

# Policy Development Guidelines



# Introduction

This guide is are intended for anyone who is engaged in the process of developing new University policies, or amending existing policies, and it originates from the University's '<u>Policy on Policies</u>'.

The guide will assist in all stages of policy development, from the initiation of a new or amended policy right through to having an approved policy published on the University's website. This guide was developed by the Risk and Compliance Officer (RCO) and any queries should be directed to the RCO.

# **Overview of Policy Management within the University**

The diagram in Fig.1 provides an overview of how a DCU policy should be developed, published and maintained in accordance with the 'Policy on Policies'. Policy Owners are responsible for the development of new policies, as well as the maintenance, regular review and updating of existing policies. Once the decision to develop a new policy, or update an existing one, has been taken the steps set out in this guide should be followed.





#### Step 1 - Identify Policy Need

The first step in the process to develop a new University Policy, or to amend an existing one, is to identify the need to do so and this is primarily the responsibility of the Policy Owner as they are responsible for the substance of the policy and for promoting compliance.

A new policy may be developed to set out the University's position in regard to a new issue or a new set of circumstances. Alternatively, an existing policy may need amendment if the



circumstances on which it was based change, or where the existing policy is no longer appropriate or fit for purpose for whatever reason.

#### **Step 2 – Review Existing Policies**

A master list of policies from within the University is maintained in an A to Z format on the University's <u>Central Policies Webpage</u> (CPW). The policies listed on the CPW are owned by the various Policy Owners from across the University with the CPW being managed by the Office of the Chief Operations Officer and maintained by the RCO. The list of policies on the CPW is not exhaustive as there may be other policies which, for whatever reason, have not been included but these are the exception. All approved University policies should, with few exceptions, be published on the CPW and are to be regarded as the 'Master' version for any given policy. Subsequently Policy Owners may establish a link on their own Unit's webpage to the location of the master version of the policy on the CPW and they are encouraged to do so.

Policy Owners should firstly check that the University does not already have an existing policy on the relevant issue by reviewing the list of policies published on the CPW. However, as the list of policies published on the website cannot be guaranteed to be exhaustive, Policy Owners should also consult with relevant members of staff to check that another policy does not already exist that addresses the issue under consideration.

#### Step 3 – Drafting a Policy

When drafting a new policy, or amending an existing one, Policy Owners should consider the following principles.

# Principle 1: Consider whether the proposed document should be designated as an official 'University Policy'

Prior to the approval by the Executive of the University's first 'Policy on Policies' in October 2015 there was no formal guidance on how an official University Policy should be developed. To address this issue the University developed a 'Hierarchy of University Documents' guide and Policy Owners should review the guide to consider whether the new policy being developed, or the current policy under review, actually meets the definition of a 'Policy' as set out in the hierarchy. Where they do not the proposed document should be re-designated as one of the other correct categories indicated in the hierarchy.

#### a) New Policies

Prior to drafting a new policy, the Policy Owner should consider whether the proposed policy meets the definition for a valid DCU policy as set out in the Hierarchy. It may be more appropriate to designate the document as a 'Procedure' or 'Regulation' or one of the other alternatives set out in the Hierarchy guide rather than as a 'Policy'.



#### b) Existing Policies

Where an existing policy is being reviewed Policy Owners are advised to use the same criteria as outlined in (a) above in determining whether the revised policy will continue to meet the definition of a University Policy as set out in the Hierarchy. It is expected that some documents formerly categorised as a 'Policy' will, on review and comparison against the definition of a policy set out in the Hierarchy, be re-classified under another more appropriate category of document from the Hierarchy.

It will also be the case that some former policies will be extensively amended to extract sections that are suitable for publication in separate documents such as 'Procedures' or 'Protocols' or one of the alternative categories set out in the Hierarchy.

**Principle 2: Brevity – Keep 'Procedures' & any other related documents, separate to the Policy** While it may not be possible or desirable in all cases University policies should, in general, be relatively brief and not exceed 4 - 5 pages in length.

As policies are intended to be brief stand-alone statements on a particular matter or position they should not be used to set out in detail the procedures or forms by which they are to be implemented. Where references are made to the means by which a policy is to be implemented, through a procedure, protocol or an alternative document category (see the Document Hierarchy for guidance) the Policy Owners should merely refer to these in the policy and list them as separate documents in the 'Related Documentation' section and <u>they should not be included, in detail, within the actual policy</u>. It should not be necessary to quote extensively from these documents within the policy as they should be available for reference elsewhere and to do so would lead to unnecessary duplication.

The means by which a policy is implemented can change from time to time but such changes are unlikely to affect the fundamental original reason(s) for the policy's existence. By considering this point, when drafting a new policy or revising an existing policy, it should remove the need to have a policy regularly updated and approved for relatively minor changes in a procedure or other category of document related to the policy.

#### Principle 3: Consider your Audience

Policies are written for a general audience and will be available publically on the University's website when approved. When drafting a policy, the Policy Owners should use clear and precise language, brief sentences and common words. The use of jargon is to be avoided but where it is used it should be included in the definitions section of the policy.



#### Principle 4: Standard Policy Template

A standard template for University Policies is available on the University's CPW. The template is mandatory for all new policies (and for existing policies undergoing revision) and it is designed to assist Policy Owners in organizing the contents and layout of a policy. The template is split into a number of sections, some of which are mandatory, and others that are optional.

When reviewing existing policies that are not in alignment with the template Policy Owners must create the new version policy in alignment with the template. It is expected that over time, as existing policies are reviewed and rewritten, that they will adhere to the layout and content of the policy template.

#### Principle 5: Gender / Minority Sensitivity

The University respects the human rights and dignity of all members of the DCU community. The University is committed to providing an environment in which all members should expect to be able to thrive and be respected and valued for their unique perspectives and contributions, so that they can achieve their fullest potential. All members of the DCU community are welcomed and valued equally and the University is committed to ensuring that all staff and students can participate freely and fully in the life of the University. All members of the DCU Community are expected to work to develop and maintain a high degree of respect and to participate in creating a positive environment.

Therefore, where appropriate when drafting a new policy or updating an existing one, the Policy Owner must give due regard to ensuring that the policy is fair and does not present barriers to participation or disadvantage any protected groups from participation. Policy Owners should also strive to use inclusive language at all times when writing a policy.

#### **Principle 6: Sentence Structure**

- Keep sentences short and to the point.
- Avoid padding or language that does not add to clarity.
- Use active language where possible i.e. language that is clear and direct and provides for the assignment of responsibility e.g. 'person X shall do activity Y' rather than 'activity Y may be done'.
- Avoid using words such as 'should' or 'may' in the policy statement section as compliance with a University policy is mandatory.
- Avoid using words such as 'ensure', 'certify', 'guarantee' as these may place an obligation on a unit or officer of the University that, in practice, is very difficult to deliver or achieve.
- Where a policy contains rules they are to be stated first with any exceptions from the rules to be stated and highlighted separately in a subsequent section or paragraph.



- Use consistent terms throughout the policy. Where a technical phrase or staff position is referred to it should be stated once in full and thereafter referred to by its acronym e.g. Chief Operations Officer (COO), Student Support & Development (SS&D), Vice President for Academic Affairs (VPAA).
- Refer to forms and other documents by title and list them separately in the 'Related Documentation' section, or as an appendix, to the policy.

#### Step 4 - Policy Approval

The process by which policies are approved is set out in the 'Policy on Policies'. Policy Owners are responsible for steering draft policies through the required approval process.

The process for reviewing and approving a draft policy may vary depending upon its nature. Policies that have a University wide scope are normally approved by the University Executive, or a sub-group or committee as delegated by the Executive. Policies whose scope is limited to a single unit may be approved by the Head of that Unit.

Prior to a draft policy being presented to the University Executive for review and approval it should firstly go to, and be approved by, the RCO. The RCO will check that the draft policy adheres to these guidelines and is in alignment with the University's Policy Template.

#### Step 5 – Publishing a Policy

Once a policy is approved it will, in the vast majority of cases, be necessary to publish the policy on the University's website, usually in two separate website locations as follows:

#### a) Central Policies Webpage (CPW) – Master Version

The location for all 'Master' versions of any University policy is the CPW. The CPW is managed by the RCO and Policy Owners liaise with the RCO to arrange for the approved final version of a policy to be published on the CPW.

#### b) Units own Webpage

In addition, policies are often also listed on Policy Owners own Unit webpage by virtue of establishing a link to the location of the master version of the policy on the CPW.

#### Policy Toolkits

Where a policy relies upon related documentation, such as separate but related Procedures, Guides, Forms etc. it is recommended that they are all published together on one webpage within the Policy Owner's section of the website. Examples of how such a webpage may be set out are:



- i) <u>Annual Leave Policy Toolkit</u>
- ii) <u>Child Protection Policy</u>

A separate guide to creating a Toolkit webpage is published at the same webpage location as this guide.

#### Step 6 – Periodical Review of Policies

Once a policy is approved it will be necessary for the policy to be periodically reviewed to check that it is still appropriate and correct. This role is the responsibility of the Policy Owner and the length of time between reviews will vary from policy to policy.

# Definitions

#### Policy Owner

The Policy Owner is the appropriate committee, academic or support unit of the University whose remit or responsibility covers the subject matter of the policy. The Policy Owner is responsible for the substance of policy as well as for promoting compliance with the policy unless stated otherwise.

### **Related Documentation**

#### 1) Policy on Policies

The Policy on Policies governs the process by which University policies are to be developed, approved, published and maintained.

#### 2) Hierarchy of University Documents

The Hierarchy of University Documents provides guidance on the typical categories of documents that are commonly in use across the University and is intended to assist staff and others in understanding where a document lies within the overall document governance framework of the University.

In addition, the Hierarchy also provides useful definitions for the various categories of documents in use across the University.

#### 3) Policy Template

The policy template is designed to assist Policy Owners in organizing the content and format of a policy.



# **Version Control**

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